

The Honorable James L. Robart

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

No. CR24-094 JLR

Plaintiff,

**[PROPOSED] PROTECTIVE ORDER**

v.

JESUS ORTIZ PLATA and  
JUAN PABLO CUELLAR MEDINA,

Defendants.

Upon unopposed motion of the United States, and for good cause shown, the Court ORDERS as follows pursuant to Federal Rule of Criminal Procedure 16(d)(1):

1. Some of the material to be produced in discovery in this matter includes personal identifying information (PII), which is defined for purposes of this Order as Social Security numbers, driver's license numbers, dates of birth, home addresses, email addresses, account numbers, financial institution account numbers including bank account numbers, and other PII. Redacting the discovery to delete PII would unnecessarily delay the disclosure of discovery to Defendant and would frustrate the intent of the discovery process. The government agrees to label material subject to this protective order as PROTECTED MATERIAL.

2. Access to discovery material containing PII will be restricted to the Defense Team, with the limited exceptions discussed in paragraphs 3 and 4, below.

1 “Defense Team” shall be limited to attorneys of record for the defendant and any of the  
2 following people working on this matter under the supervision of the attorneys of record:  
3 attorneys, investigators, paralegals, law clerks, testifying and consulting experts,  
4 interpreters/translators/transcriptionists, and legal assistants. For purposes of this Order,  
5 “Defense Team” does not include the defendant. Defendant’s attorneys shall inform any  
6 member of the Defense Team to whom disclosure of discovery material is made of the  
7 existence and terms of this Protective Order.

8 3. Members of the Defense Team shall not disseminate discovery material  
9 containing PII to A person other than the Defense Team, except as discussed below in  
10 paragraph 4.

11 4. Defense counsel may provide discovery to the defendant, subject to the  
12 following conditions:

- 13 a. Defendant is permitted to have a single copy of the protected  
14 discovery and shall not use any discovery material, including  
15 material containing PII for any purpose other than for case  
16 preparation.
- 17 b. Defendant will maintain only a single copy of discovery containing  
18 PII, which shall not be duplicated. Defendant shall not provide  
19 copies of the material containing PII to any third parties and may  
20 only review the discovery material containing PII either alone or in  
21 the presence of the Defense Team; and
- 22 c. Within 30 days of the entry of any final judgment in this case, the  
23 defendant shall destroy or return to defense counsel all discovery  
24 material containing PII.

25 5. Any discovery material containing PII that the Defense Team files on the  
26 Court’s public docket shall be filed consistent with Local Criminal Rule 49.1.

